

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

EMAD ALABSI

Plaintiff.

v.

CITY OF CLEVELAND, ET AL

Respondent,

) CASE NO. 1:20-cv-1933

)

) MAGISTRATE JUDGE HENDERSON

)

) **AFFIDAVIT OF MICHAEL J. PIKE**

)

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)

NOW COMES Affiant, Michael J. Pike, Esq., and for his Affidavit states as follows:

1. I am an adult who is competent to make this Affidavit and I have first-hand knowledge of the facts set forth herein.

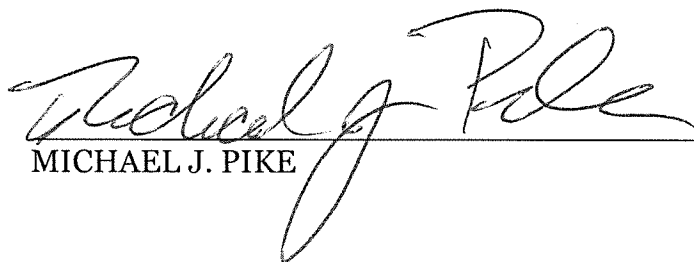
2. I am employed by the City of Cleveland Department of Law as an Assistant Director of Law.

3. The entries in the attached Time Log in the above captioned case are true and accurate to the best of my knowledge regarding the entries contained therein.

4. The attached Time Log does not contain other entries in this matter for additional work related to this case for emails, phone calls, and other work.

5. This Time Log does represent the majority of the hours spent defending the City of Cleveland in this matter.

FURTHER AFFIANT SAYETH NAUGHT.

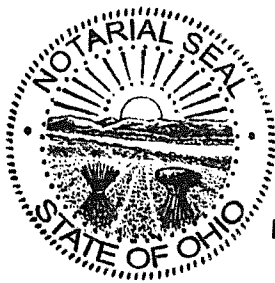
  
MICHAEL J. PIKE

**EXHIBIT  
B**

[illegible]

SWORN to and subscribed before me, this 7 day of September, 2021, by the foregoing Affiant, who did swear or affirm that it was his true act and deed.

*Luz E Bermudez*  
NOTARY PUBLIC



LUZ E. BERMUDEZ  
NOTARY PUBLIC  
STATE OF OHIO  
Recorded in  
Cuyahoga County  
My Comm. Exp. 9-30-24

**Alabsi v. City of Cleveland Et al. - Case No. 1:20-cv-1933**

**Time Log for Mr. Michael Pike**

10/6/20 - (.7) Receipt and Review of Complaint

10/6/20 - (.3) Prepare and file Motion for Extension of Time

10/6/20 - (n/c) Review of Marginal Entry Order granting Motion for Extension of Time

10/7/20 – (n/c) Review Jack Casino motion for extension of time, and order granting same.

10/7/20 – (n/c) Review motion for substitution of time filed by Defendants.

10/28//20 - (.3) Review of Answer to Complaint filed by Defendant Jack Entertainment

10/29/20 (.3) Review and Research Notice to Attorney Rachel L. Coles re: not being admitted to practice into the Northern District of Ohio.

11/4/20 (1.2) Legal research regarding claims and defenses of same related to allegations against the City of Cleveland.

11/5/20 (1.3) Prepare and file Answer to Complaint

11/6/20- (.5) Review the Case Management Conference Scheduling Order

11/6/20- (.2) Review Notice of Compliance filed by Jack Cleveland Casino LLC.

11/6/20- (.4) Review Separate Answer filed Peter Sains, II

11/6/20- (.3) Review Separate Answer filed Bruce Taylor

11/6/20- (n/c) Review Notice of Appearance for Peter Sains, II, Bruce Taylor

12/1/20-(n/c) Review correspondence from defendant counsel re: consent to magistrate.

12/1/20-(0.3) Telephone conference with client regrading consent to magistrate.

12/2/20-(n/c) Prepare correspondence to all parties regarding consent to magistrate.

12/3/21-(0.6) Complete preparation of initial disclosures.

12/3/20 - (.2) Review consent to case being transferred to the docket of Magistrate Judge Carmen E. Henderson.

12/3/20- (.2) Review Certificate of Service of Initial Disclosures by Peter Sains, II, Bruce Taylor, Jack Cleveland Casino, LLC, and all Plaintiffs

12/3/20 - (n/c) Review Notice of Dismissal under FRCP 41(a)(1) without prejudice of Defendant Bruce Taylor.

12/3/21-(0.3) Review correspondence from plaintiff's counsel setting forth initial \$4,000,000 demand with no supporting documentation.

12/4/21-(0.2) Prepare correspondence to plaintiff's counsel regarding dismissal of Division of Police.

12/7/20- (.5) Review the Amended Case Management Conference Scheduling Order, and Order granting Defendant's Motion to Substitute Attorney.

12/11/20- (.2) Review of Notice of Dismissal under FRCP 41(a)(1)

12/14/20-(0.8) Review Report of Parties' Planning Meeting filed by all Plaintiff including several correspondences related to filing of same.

12/14/20 (n/c) Review Marginal Entry Order dismissing Defendant City of Cleveland Police Department

12/15/20 – (0.7 ) Review file materials and pleadings regarding preparation for attendance at Case Scheduling Conference.

12/17/21-(0.6) Attend initial telephone conference with Magistrate Henderson.

12/18/20-(0.5) Review the Case Management Conference Scheduling Order

1/15/21- (0.4) Review Amended Complaint filed by Plaintiff with additional Defendant.

1/21/21-(0.3) Review docket and prepare correspondence to plaintiff's counsel regarding dismissal of non-sui juris Division of Police.

1/21/21- (n/c) Review of Notice of Dismissal under FRCP 41(a)(1)

1/28/21- (0.5) Prepare and file Answer to Amended Complaint.

1/29/21-(0.3) Review Answer to Amended Complaint filed by Jack Cleveland Casino LLC.

1/29/21-(0.3) Review Answer to Amended Complaint filed by Peter Sains, II.

3/08/21-(0.8) Begin legal research regarding preparation of MJOP re: state law claims.

3/09/21-(1.4) Preparation of MJOP regarding factual allegations in Amended Complaint.

3/10/21-(2.4) Preparation of MJOP regarding state law claims.

3/12/21-(1.9) Legal research regarding Federal claims against City re preparation of MJOP

3/17/21-(2.3) Preparation of MJOP regarding Federal claims.

3/30/21- (2.1) Complete Preparation of Motion for Judgment on the Pleadings and filing of same.

4/1/2021- (n/c) Review Stipulated Motion for Substitution of Jack Cleveland Casino LLC as Proper Party.

4/1/2021- (n/c) Review Marginal Entry Order granting Stipulated Motion for Substitution of Jack Cleveland Casino LLC as Proper Party.

4/1/21-(n/c) Review correspondence from court regarding joint status update and prepare correspondence re: same.

6/28/21- (0.5) Review of court order regarding Motion for Judgment on the Pleadings

7/12/21 – (0.6) Review of Motion for Leave to file opposition instanter granting Motion for Judgment on the Pleadings

7/26/21- (2.1) Prepare and file Reply Brief in Support for Judgment on the Pleadings.

8/25/21– (0.5) Review Memorandum Opinion and Order granting the Judgment on the Pleadings.

8/25/21-(0.3) Telephone conference with client regarding granting of MJOP.

9/1/21– (1.9) Begin preparation of motion for fees.

9/1/21- (1.6) Legal research regarding preparation of motion for fees.

9/7/21-(1.3) Complete preparation of motion for fees.

**Total Hours – 31.9**

**53 entries – n/c for 12 or 22% of them.**